

STATISTICAL INFORMATION ONLY: Debtor must select the number of each of the following items included in the Plan.

0 Valuation of Security

0 Assumption of Executory Contract or Unexpired Lease

0 Lien Avoidance

Last revised: September 1, 2018

**UNITED STATES BANKRUPTCY COURT
District of New Jersey**

In Re: **Angela M Coyle**

Case No.: **18-33297**

Judge: **ABA**

Debtor(s)

CHAPTER 13 PLAN AND MOTIONS

☐ Original

☒ Modified/Notice Required

Date: **3/25/2020**

☐ Motions Included

☐ Modified/No Notice Required

THE DEBTOR HAS FILED FOR RELIEF UNDER
CHAPTER 13 OF THE BANKRUPTCY CODE.

YOUR RIGHTS MAY BE AFFECTED

You should have received from the court a separate *Notice of the Hearing on Confirmation of Plan*, which contains the date of the confirmation hearing on the Plan proposed by the Debtor. This document is the actual Plan proposed by the Debtor to adjust debts. You should read these papers carefully and discuss them with your attorney. Anyone who wishes to oppose any provision of this Plan or any motion included in it must file a written objection within the time frame stated in the *Notice*. Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated. This Plan may be confirmed and become binding, and included motions may be granted without further notice or hearing, unless written objection is filed before the deadline stated in the *Notice*. The Court may confirm this plan, if there are no timely filed objections, without further notice. See Bankruptcy Rule 3015. If this plan includes motions to avoid or modify a lien, the lien avoidance or modification may take place solely within the chapter 13 confirmation process. The plan confirmation order alone will avoid or modify the lien. The debtor need not file a separate motion or adversary proceeding to avoid or modify a lien based on value of the collateral or to reduce the interest rate. An affected lien creditor who wishes to contest said treatment must file a timely objection and appear at the confirmation hearing to prosecute same.

The following matters may be of particular importance. Debtors must check one box on each line to state whether the plan includes each of the following items. If an item is checked as "Does Not" or if both boxes are checked, the provision will be ineffective if set out later in the plan.

THIS PLAN:

☐ DOES ☒ DOES NOT CONTAIN NON-STANDARD PROVISIONS. NON-STANDARD PROVISIONS MUST ALSO BE SET FORTH IN PART 10.

☒ DOES ☐ DOES NOT LIMIT THE AMOUNT OF A SECURED CLAIM BASED SOLELY ON VALUE OF COLLATERAL, WHICH MAY RESULT IN A PARTIAL PAYMENT OR NO PAYMENT AT ALL TO THE SECURED CREDITOR. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

☐ DOES ☒ DOES NOT AVOID A JUDICIAL LIEN OR NONPOSSESSORY, NONPURCHASE-MONEY
SECURITY INTEREST. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

Initial Debtor(s)' Attorney TD Initial Debtor: AMC Initial Co-Debtor _____

Part 1: Payment and Length of Plan

a. The debtor shall pay 150.00 Monthly to the Chapter 13 Trustee, starting on 6/1/2020 for approximately 19 months for a total of 36 months.

b. The debtor shall make plan payments to the Trustee from the following sources:

- ☒ Future Earnings
☐ Other sources of funding (describe source, amount and date when funds are available):

c. Use of real property to satisfy plan obligations:

☐ Sale of real property

Description:

Proposed date for completion: _____

☐ Refinance of real property:

Description:

Proposed date for completion: _____

☒

Loan modification with respect to mortgage encumbering property:

on 1012 Pitney Road Absecon, N.J. 08201 serviced by Shellpoint Mortgage

Proposed date for completion:

Was completed and

approved on 9/30/2019

d. ☐ The regular monthly mortgage payment will continue pending the sale, refinance or loan modification.

e. ☐ Other information that may be important relating to the payment and length of plan:

Part 2: Adequate Protection

☒ NONE

a. Adequate protection payments will be made in the amount of \$____ to be paid to the Chapter 13 Trustee and disbursed pre-confirmation to ____ (creditor).

b. Adequate protection payments will be made in the amount of \$____ to be paid directly by the debtor(s) outside the Plan, pre-confirmation to: ____ (creditor).

Part 3: Priority Claims (Including Administrative Expenses)

a. All allowed priority claims will be paid in full unless the creditor agrees otherwise:

Creditor	Type of Priority	Amount to be Paid
Thomas E. Dowey, Esq.	Attorney Fees	\$1,760.00

b. Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount:

Check one:

☒ None

☐ The allowed priority claims listed below are based on a domestic support obligation that has been assigned to or is owed to a governmental unit and will be paid less than the full amount of the claim pursuant to 11 U.S.C.1322(a)(4):

Creditor	Type of Priority	Claim Amount	Amount to be Paid
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Part 4: Secured Claims

a. Curing Default and Maintaining Payments on Principal Residence: ☒ NONE

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor shall pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)
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b. Curing and Maintaining Payments on Non-Principal Residence & other loans or rent arrears: ☒ NONE

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor will pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)
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c. Secured claims excluded from 11 U.S.C. 506: ☒ NONE

The following claims were either incurred within 910 days before the petition date and are secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor(s), or incurred within one year of the petition date and secured by a purchase money security interest in any other thing of value:

Name of Creditor	Collateral	Interest Rate	Amount of Claim	Total to be Paid through the Plan Including Interest Calculation
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d. Requests for valuation of security, Cram-down, Strip Off & Interest Rate Adjustments ☒ NONE

1.) The debtor values collateral as indicated below. If the claim may be modified under Section 1322(b)(2), the secured creditor shall be paid the amount listed as the "Value of the Creditor Interest in Collateral," plus interest as stated. The portion of any allowed claim that exceeds that value shall be treated as an unsecured claim. If a secured claim is identified as having "NO VALUE" it shall be treated as an unsecured claim.

NOTE: A modification under this section ALSO REQUIRES the appropriate motion to be filed under Section 7 of the Plan.

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor Interest in Collateral	Annual Interest Rate	Total Amount to Be Paid
Specialized Loan Servicing	1012 Pitney Road Absecon, N.J.	30000.00	110000.00	114000.00	0	0	0

2.) Where the Debtor retains collateral and completes the Plan, payment of the full amount of the allowed secured claim shall discharge the corresponding lien.

e. Surrender ☒ NONE

Upon confirmation, the stay is terminated as to surrendered collateral only under 11 U.S.C. 362(a) and that the stay under 11 U.S.C 1301 be terminated in all respects. The Debtor surrenders the following collateral:

Creditor	Collateral to be Surrendered	Value of Surrendered Collateral	Remaining Unsecured Debt
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f. Secured Claims Unaffected by the Plan ☒ NONE

The following secured claims are unaffected by the Plan:

Creditor

g. Secured Claims to be Paid in Full Through the Plan ☒ NONE

Creditor	Collateral	Total Amount to be Paid through the Plan
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Part 5: Unsecured Claims ☐ NONE

a. **Not separately classified** allowed non-priority unsecured claims shall be paid:

- ☐ Not less than \$___ to be distributed *pro rata*
- ☐ Not less than ___ percent
- ☒ *Pro Rata* distribution from any remaining funds

b. **Separately classified unsecured** claims shall be treated as follows:

Creditor	Basis for Separate Classification	Treatment	Amount to be Paid
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Part 6: Executory Contracts and Unexpired Leases ☒ NONE

(NOTE: See time limitations set forth in 11 U.S.C. 365(d)(4) that may prevent assumption of non-residential real property leases in this Plan.)

All executory contracts and unexpired leases, not previously rejected by operation of law, are rejected, except the following, which are assumed:

Creditor	Arrears to be Cured in Plan	Nature of Contract or Lease	Treatment by Debtor	Post-Petition Payment
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Part 7: Motions ☐ NONE

NOTE: All plans containing motions must be served on all potentially affected creditors, together with local form, *Notice of Chapter 13 Plan Transmittal*, within the time and in the manner set forth in D.N.J. LBR 3015-1. A *Certification of Service, Notice of Chapter 13 Plan Transmittal and valuation* must be

filed with the Clerk of Court when the plan and transmittal notice are served.

a. Motion to Avoid Liens under 11 U.S.C. Section 522(f). ☒ NONE

The Debtor moves to avoid the following liens that impair exemptions:

Creditor	Nature of Collateral	Type of Lien	Amount of Lien	Value of Collateral	Amount of Claimed Exemption	Sum of All Other Liens Against the Property	Amount of Lien to be Avoided
Specialized Loan Servicing	1012 Pitney Road Absecon NJ	second mortgage	30,000.00	110,000.00		114000.00	30000.00

b. Motion to Avoid Liens and Reclassify Claim from Secured to Completely Unsecured. ☐

NONE

The Debtor moves to reclassify the following claims as unsecured and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor's Interest in Collateral	Total Amount of Lien to be Reclassified
Specialized Loan Servicing	1012 Pitney Road Absecon NJ	30000.00	110,000	114000	0	30000.00

c. Motion to Partially Void Liens and Reclassify Underlying Claims as Partially Secured and Partially Unsecured. ☒ NONE

The Debtor moves to reclassify the following claims as partially secured and partially unsecured, and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Amount to be Deemed Secured	Amount to be Reclassified as Unsecured
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Part 8: Other Plan Provisions

a. Vesting of Property of the Estate

- ☒ Upon Confirmation
☐ Upon Discharge

b. Payment Notices

Creditors and Lessors provided for in Parts 4, 6 or 7 may continue to mail customary notices or coupons to the Debtor notwithstanding the automatic stay.

c. Order of Distribution

The Standing Trustee shall pay allowed claims in the following order:

- 1) Ch. 13 Standing Trustee Commissions
- 2) Other Administrative Claims
- 3) Secured Claims
- 4) Lease Arrearages
- 5) Priority Claims
- 6) General Unsecured Claims

d. Post-Petition Claims

The Standing Trustee ☒ is, ☐ is not authorized to pay post-petition claims filed pursuant to 11 U.S.C. Section 1305(a) in the amount filed by the post-petition claimant.

Part 9: Modification ☒ NONE

If this Plan modifies a Plan previously filed in this case, complete the information below.

Date of Plan being modified: _____

Explain below **why** the plan is being modified: _____

Explain below **how** the plan is being modified: _____

Pursuant to Court Order Approving Mortgage Modification

Are Schedules I and J being filed simultaneously with this Modified Plan? ☒ Yes ☐ No

Part 10 : Non-Standard Provision(s): Signatures Required

Non-Standard Provisions Requiring Separate Signatures:

☒ NONE

☐ Explain here:

Any non-standard provisions placed elsewhere in this plan are ineffective.

Signatures

The Debtor(s) and the attorney for the Debtor(s), if any, must sign this Plan.

By signing and filing this document, the debtor(s), if not represented by an attorney, or the attorney for the debtor(s) certify that the wording and order of the provisions in this Chapter 13 Plan are identical to *Local Form, Chapter 13 Plan and Motions*, other than any non-standard provisions included in Part 10.

I certify under penalty of perjury that the above is true.

Date: May 20, 2020

/s/ Angela M Coyle

Angela M Coyle

Debtor

Date: _____

Joint Debtor

Date: May 20, 2020

/s/ Thomas E. Dowey, Esq

Thomas E. Dowey, Esq

Attorney for the Debtor(s)

Certificate of Notice Page 7 of 8

United States Bankruptcy Court
District of New JerseyIn re:
Angela M Coyle
DebtorCase No. 18-33297-ABA
Chapter 13**CERTIFICATE OF NOTICE**

District/off: 0312-1

User: admin
Form ID: pdf901Page 1 of 2
Total Noticed: 31

Date Rcvd: May 20, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 22, 2020.

db +Angela M Coyle, 1012 Pitney Road, Absecon, NJ 08201-9716
 aty +KML Law Group, PC, 216 Haddon Avenue, Ste 406, Collingswood, NJ 08108-2812
 cr +NewRez LLC d/b/a Shellpoint Mortgage Servicing as, Hill Wallack, 21 Roszel Road,
 P.O. Box 5226, Princeton, NJ 08543-5226
 517889688 +GMAC mortgage, P O Box 4622, Waterloo, IA 50704-4622
 517889689 +HSBC Bank, P.O. Box 5253, Carol Stream, IL 60197-5253
 517889690 +HSBC Card Services C/O The Bureaus Inc., 1717 Central St., Evanston, IL 60201-1507
 517889691 +HSBC/Boscov's, P.O. Box 5253, Carol Stream, IL 60197-5253
 517922630 +Legacy Mortgage Asset Trust 2018-SL1, c/o Specialized Loan Servicing LLC,
 8742 Lucent Blvd, Suite 300, Highlands Ranch, Colorado 80129-2386
 518012544 MTGLQ Investors, L.P., c/o Shellpoint Mortgage Servicing, PO Box 10826,
 Greenville, SC 29603-0826
 517889693 +Phelan Hallinan Diamond & Jones, 400 Fellowship Road, Suite 100,
 Mount Laurel, NJ 08054-3437
 517889694 +Phelan Hallinan Diamond & Jones, PC, 400 Fellowship Road, Suite 100,
 Mount Laurel, NJ 08054-3437
 517889695 +Pressler & Pressler, 7 Entin Rd., Parsippany, NJ 07054-5020
 517889696 +Santander Consumer USA, Attn: bankruptcy Dept, P.O. Box 961245, Fort Worth, TX 76161-0244
 517889697 +Shellpoint Mortgage Servicing, P.O. Box 740039, Cincinnati, OH 45274-0039
 517889698 +Specialized Loan Servicing, 8742 Lucent Blvd., Suite 300, Highland Ranch, CO 80129-2386
 517889699 +Target Corp., P O Box 673, Minneapolis, MN 55440-0673
 517891997 +The Bureaus, Inc., c/o of PRA Receivables Management, LLC, PO Box 41021,
 Norfolk, VA 23541-1021
 517889701 +US Bank Nat'l Association, Equity Loan Trust 2004 HE4, 300 East Delaware Ave., 8th Floor,
 Wilmington, DE 19809-1515
 517889700 +Universal Card / Citibank, PO Box 6241, Sioux Falls, SD 57117-6241

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
smg E-mail/Text: usanj.njbankr@usdoj.gov May 20 2020 22:38:48 U.S. Attorney, 970 Broad St.,
Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534

smg +E-mail/Text: ustpreion03.ne.ecf@usdoj.gov May 20 2020 22:38:46 United States Trustee,
Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100,
Newark, NJ 07102-5235
 517889682 +E-mail/PDF: AIS.cocard.ebn@americaninfosource.com May 20 2020 22:48:59 Cap One,
P.O. Box 5253, Carol Stream, IL 60197-5253
 517889683 +E-mail/PDF: AIS.cocard.ebn@americaninfosource.com May 20 2020 22:47:56 Capital One,
P.O. Box 30281, Salt Lake City, UT 84130-0281
 517893389 +E-mail/Text: bankruptcy@cayps.com May 20 2020 22:38:59 Cavalry SPV I, LLC,
500 Summit Lake Drive, Ste 400, Valhalla, NY 10595-2321
 517889685 E-mail/Text: mrdiscen@discover.com May 20 2020 22:38:15 Discover, P.O. Box 30943,
Salt Lake City, UT 84130
 517889687 E-mail/Text: mrdiscen@discover.com May 20 2020 22:38:15 Discover Financial Services,
P.O. Box 15316, Wilmington, DE 19850
 517889686 +E-mail/Text: mrdiscen@discover.com May 20 2020 22:38:15 Discover Bank,
2500 Lake Cook Road, Riverwoods, IL 60015-3801
 517889684 E-mail/PDF: ais.chase.ebn@americaninfosource.com May 20 2020 22:48:23 Chase,
P.O. Box 15298, Wilmington, DE 19850
 517889692 +E-mail/Text: wfmelectronicbankruptcynotifications@verizonwireless.com May 20 2020 22:38:05
MCI / Verizon, 500 Technology Drive, Suite 300, Weldon Springs, MO 63304-2225
 517902240 +E-mail/PDF: acg.acg.ebn@americaninfosource.com May 20 2020 22:47:58 NCEP, LLC,
AIS Portfolio Services, LP, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118-7901
 517954349 +E-mail/PDF: acg.acg.ebn@americaninfosource.com May 20 2020 22:49:01
NCEP, LLC by AIS Portfolio Services, LP as agent, P.O. Box 4138, Houston, TX 77210-4138
 TOTAL: 12

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: May 22, 2020

Signature: /s/Joseph Speetjens

District/off: 0312-1

User: admin
Form ID: pdf901

Page 2 of 2
Total Noticed: 31

Date Rcvd: May 20, 2020

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 20, 2020 at the address(es) listed below:

Angela Catherine Pattison on behalf of Creditor NewRez LLC d/b/a Shellpoint Mortgage
Servicing as servicer for MTGLQ Investors, L.P. apattison@hillwallack.com,
hwbknj@hillwallack.com
Denise E. Carlon on behalf of Creditor Legacy Mortgage Asset Trust 2018-SL1
dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Elizabeth K. Holdren on behalf of Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing as
servicer for MTGLQ Investors, L.P. eholdren@hillwallack.com,
jhanley@hillwallack.com/hwbknj@hillwallack.com
Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com
Isabel C. Balboa on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com,
summarymail@standingtrustee.com
Kevin Gordon McDonald on behalf of Creditor Legacy Mortgage Asset Trust 2018-SL1
kmcdonald@kmlawgroup.com, bkgroup@kmlawgroup.com
Thomas E. Dowe on behalf of Debtor Angela M Coyle tdesquire@hotmail.com
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 8